

**UNITED STATES DISTRICT COURT
MIDDLE DISTRICT OF PENNSYLVANIA**

INSULATE SB, INC., a California
Corporation, individually and on behalf
of all others similarly situated,

Plaintiff,

v.

ABRASIVE PRODUCTS &
EQUIPMENT, et al.,

Defendants.

Civil Action No. 1:13-cv-01609-YK
(Chief Judge Yvette Kane)

Filed Electronically

ORAL ARGUMENT REQUESTED

**PLAINTIFF’S MOTION FOR EXPEDITED DISCOVERY AND
MOTION TO SHORTEN TIME**

Plaintiff Insulate SB, Inc., through its undersigned counsel, hereby moves this Court for an Order granting Plaintiff’s Motion for Expedited Discovery and Motion to Shorten Time.

This motion is made pursuant to Rules 26 and 34 of the Federal Rules of Civil Procedure, and on the grounds that expedited discovery is required against Defendants to aid Plaintiff in supporting (1) its concurrently filed motion for preliminary injunction; and (2) its impending motion for class certification.

Because Defendants’ unlawful and anticompetitive conduct is ongoing, Plaintiff must move expeditiously for a preliminary injunction to prevent further irreparable harm. Accordingly, Plaintiff also respectfully requests that the Court shorten the time for Defendants to respond to this Motion and schedule an

expedited hearing, so that Plaintiff may promptly submit its brief and evidence in support of the Motion for Preliminary Injunction.

Given the urgency articulated herein, counsel for Plaintiff is unable to seek the agreement of Defendants regarding the relief requested.

The grounds for this motion are set forth in the following memorandum of law, all pleadings and records on file, and any additional briefing and argument presented to the Court.

Respectfully submitted,

s/ Christopher A. Nedeau

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Counsel for Plaintiff Insulate SB, Inc.

June 19, 2013

PROOF OF SERVICE

I certify that I served a copy of the foregoing Plaintiff's Motion for Expedited Discovery and Motion to Shorten Time on the following parties by certified mail:

Abrasive Products & Equipment
c/o National Registered Agents, Inc.
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Advanced Finishing Systems, Inc.
Attn: Steven Edmondson
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Air Power, Inc.
Attn: William A. Ball
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Airtech Spray Systems
Attn: Joe A. Acosta
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Houston, TX 77018

Barnhardt Manufacturing Company
Attn: Thomas L Barnhardt
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Charlotte, NC 28205

C.H. Reed, Inc.
301 Poplar Street
Hanover, PA 17331

C.J. Spray Inc.
6270 Claude Way E
Inver Grove Heights, MN 55076

Carolina Equipment & Supply Co. Inc. (CESCO Inc.)

Attn: E. Larry Fulmer
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North Charleston, SC 29418

Clemtex, Inc.

Attn: David E. Groves
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Coast Industrial Systems, Inc.

Attn: Larry L. Onstott, Jr.
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San Diego, CA 92113

Coatings Holdings, Ltd.

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Green Lake, WI 54941

Corrosion Specialties, Inc.

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Hydraflow Equipment Co.
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Marco Group International, Inc. (MARCO)
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N.C.F.I. Polyurethanes
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Specialty Products, Inc.
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Spray Foam Nation
(Registered under Energy Independence Inc.)
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Spray Pump, Inc.
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Spray-Quip, Inc.
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Houston, TX 77023

Ultimate Linings, Ltd.
Attn: Alan N. Magenheim
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Houston, TX 77098

Urethane Supply Company
(registered Under Signal Ventures Inc.)
Attn: Keith R. Lammon
264 Kirk Road SW
Rainsville, AL 35986

s/ Lawrence H. Pockers
Lawrence H. Pockers

June 19, 2013